

**JacksonLewis**

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**VIA ECF**

Hon. Paul G. Gardephe, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2204  
New York, New York 10007

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

  
Paul G. Gardephe, U.S.D.J.

**Dated:** October 23, 2020

Re: ***Chugg v. QBE Americas, Inc. et al.***  
**Case No.: 18 Civ. 10221 (PGG)**

Dear Judge Gardephe:

We represent Defendants QBE Americas, Inc. (“QBE”), Victor Santos, Lourdes Mendez, and Damir Pajazetovic (sued incorrectly herein as “Damir Pajestovic”) (collectively, “Defendants”) in the above-referenced matter. We write jointly with counsel for Plaintiff Jasleen Chugg to request an extension of the Parties’ deadline to submit pre-motion letters seeking leave to file motions for summary judgment from October 30, 2020, to and including December 23, 2020.

As noted in the Parties’ September 14, 2020 (Docket No. 67) letter-motion, they have agreed to attempt to resolve this case through private mediation and believe that mediation will have a greater likelihood of success if the Parties are not simultaneously expending resources briefing summary judgment motions. The Parties have selected a mediator, but the earliest date that she is available for a mediation session is December 2, 2020. Adjourning the deadline for submission of pre-motion letters to December 23, 2020, will afford the Parties an opportunity to attend the December 2, 2020, mediation session and, if necessary, continue negotiations during a brief window thereafter, before redirecting their attention and resources to summary judgment motion practice.

This is the Parties’ second request for an extension of this deadline. The Parties have completed fact and expert discovery and are prepared to move forward with summary judgment motion practice in the event mediation is unsuccessful.

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ Lori D. Bauer  
Lori D. Bauer

cc: All counsel of record (via ECF)

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October 22, 2020

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